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September 2, 2020

**Via ECF**

Hon. Michael A. Hammer, U.S.M.J.  
Martin Luther King Federal Building  
& U.S. Courthouse  
50 Walnut Street, Room 2042  
Newark, NJ 07101

**RE: *Jones v. Pi Kappa Alpha, et als***  
**Civil Action No. 2:16-cv-7720**

Dear Judge Hammer:

As Your Honor knows, I represent Plaintiff with respect to the above matter. This letter is being submitted jointly, on behalf of Plaintiff, the Ramapo Defendants and the PIKE International Defendants. We wanted to update Your Honor with additional information regarding same in anticipation of tomorrow morning's Case Management Conference Call.

As I mentioned in my August 31<sup>st</sup> letter to the Court, Counsel for the Ramapo Defendants and I have been conferring with respect to the open issues regarding discovery. In addition to taking steps to resolving the discovery disputes/issues, progress has been made with respect to the commencement of settlement negotiations.

We have further discussed the idea of Mediation, specifically, a global mediation involving all of the parties. Counsel for the Ramapo Defendants (Jemi Lucey, Esquire), as well as Counsel for the PIKE International Defendants (Michael E. Gorelick, Esquire), and I, believe that Mediation would be productive and meaningful at this time. We also wanted to see if Your Honor would be able to coordinate the initial sessions. (There have been discussions as to a private Mediator as well.)

We hope to discuss this further with Your Honor tomorrow.

Thank you for Your Honor's time and consideration in this regard.

Respectfully submitted,



Patrick J. Whalen, Esquire

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cc: Counsel of Record (via ECF)